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17 *Attorneys for Plaintiffs*

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 A.H. and H.H., in each case a minor, by
21 and through their guardian *ad litem*
22 Crystal Hanson, individually and as
23 successor in interest to Shane Holland,
24 deceased; C.H., a minor, by and through
25 her guardian ad litem, Reymi Updike;
26 individually and as successor in interest
27 to Shane Holland, deceased, and
PATRICIA HOLLAND, individually,

28 Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO;
JUSTIN LOPEZ DOES 1-10, inclusive,

Defendants.

Case No. 5:23-cv-01028-JGB-SHK

Assigned to:
Hon Jesus G. Bernal
Hon. Magistrate Judge Shashi H.
Kewalramani

**DECLARATION OF RENEE V.
MASONGSONG IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO STAY
PENDING CONCLUSION
OF THE CALIFORNIA
DEPARTMENT OF JUSTICE
INVESTIGATION**

Date: Jan. 8, 2024

Time: 9:00 a.m.

Ctrm: 1

DECLARATION OF RENEE V. MASONGSONG

2 1. I am an attorney licensed to practice law in the United States District
3 Court for the Central District of California. I am one of the attorneys of record for the
4 Plaintiffs in this action. I have personal knowledge of the matters stated herein and
5 would and could testify competently thereto if called. I make this declaration in
6 support of Plaintiffs' Opposition to Defendants' Motion to Stay.

7 2. I am one of the attorneys currently handling the Central District matter
8 *Garcia v. City of Tustin*, no. 8:22-cv-00131 SPG KES, which arises from the August
9 9, 2021 shooting of Luis Garcia. The CA DOJ’s website shows that the shooting of
10 Luis Garcia has been “under investigation” for over 28 months now.
11 (<https://oag.ca.gov/ois-incidents/current-cases> (BI-LA2021-00019)).

12 3. In the *Garcia* matter, the parties proceeded with the shooting officer's
13 deposition, notwithstanding the pending CA DOJ investigation, and no aspect of the
14 *Garcia* civil case was stayed.

15 4. The CA DOJ's website also shows that the July 26, 2021 shooting of
16 Samuel Soto, as well as the August 7, 2021 shooting of Che Zuniga, are still under
17 investigation more than 28 months after those shootings. (<https://oag.ca.gov/ois->
18 incidents/current-cases (BI-RI2021-00023 and BI-RI2021-00024)).

19 5. It is public information that the CA DOJ's investigation into the
20 September 28, 2021 shooting of Brandon Lopez was not released until November 1,
21 2023.

22 I declare under penalty of perjury of the laws of the United States of America
23 that the foregoing is true and correct, and that this declaration was executed this 18th
24 day of December 2023, at Woodland Hills, California.

s/ *Renee V. Masongsong*

Renee V. Masongsong